

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WASHINGTON STATE ASSOCIATION OF
HEAD START AND EARLY CHILDHOOD
ASSISTANCE AND EDUCATION
PROGRAM; ILLINOIS HEAD START
ASSOCIATION; PENNSYLVANIA HEAD
START ASSOCIATION; WISCONSIN HEAD
START ASSOCIATION; FAMILY
FORWARD OREGON; and PARENT
VOICES OAKLAND,

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official
capacity as Secretary of Health and Human
Services; U.S. DEPARTMENT OF HEALTH
AND HUMAN SERVICES; ANDREW
GRADISON, in his official capacity as Acting
Assistant Secretary of the Administration for
Children and Families; ADMINISTRATION
FOR CHILDREN AND FAMILIES; OFFICE
OF HEAD START; and TALA HOOBAN, in
her official capacity as Acting Director of the
Office of Head Start,

Defendants.

Case No. 2:25-cv-00781-RSM

DEFENDANTS' NOTICE OF
SUPPLEMENTAL AUTHORITY

Pursuant to Local Civil Rule 7(n), Defendants hereby bring to the Court's attention relevant supplemental authority which was issued after the briefing was complete on Plaintiffs' Motion for a Preliminary Injunction and Plaintiffs' Motion for a Temporary Restraining Order.

First, the United States Supreme Court entered a stay pending appeal in *McMahon v. New York*, 606 U.S. ___, 2025 WL 1922626 (July 14, 2025) (Mem.), which reflects the Court's determination that the Government is likely to prevail against a challenge to a reduction-in-force (RIF) at the Department of Education. *See* Exhibit A.

Second, the Supreme Court entered a stay pending appeal in *Trump v. Am. Fed'n of Gov't Emps.*, 606 U.S. ___, 2025 WL 1873449 (July 8, 2025) (Mem.), which covered the same RIFs and restructuring at issue in this case. *See* Exhibit B.

Third, the U.S. Department of Health and Human Services (HHS) has agreed to stay enforcement of the Notice of the reinterpretation of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), in *State of New York v. U.S. Dep't of Justice*, 1:25-cv-00345-MSM-PAS (D.R.I.), while that court adjudicates a pending Motion for a Preliminary Injunction, which encompasses the same issues in Plaintiffs' Motion for a Temporary Restraining Order. *See* Exhibit C.

DATED this 29th day of July, 2025.

Respectfully submitted,

TEAL LUTHY MILLER
Acting United States Attorney

s/ Kristin B. Johnson

KRISTIN B. JOHNSON, WSBA #28189
Assistant United States Attorney
United States Attorney's Office
700 Stewart St., Ste. 5220, Seattle, Wash. 98101
Telephone No. (206) 553-7970 / Fax No. (206) 553-4073
Email: kristin.b.johnson@usdoj.gov

Attorneys for Defendants